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**From:** Parker, Cindy [parker.cindy@epa.gov]  
**Sent:** 8/13/2018 6:29:34 PM  
**To:** Verhalen, Frances [verhalen.frances@epa.gov]  
**CC:** Madden, Joshua [madden.joshua@epa.gov]  
**Subject:** RE: Sterigenics Santa Teresa - questions

Thank you.  
This may be obe'd by now.  
I'll get that ball rolling, just in case, though.

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**From:** Verhalen, Frances  
**Sent:** Monday, August 13, 2018 12:47 PM  
**To:** Parker, Cindy <parker.cindy@epa.gov>  
**Cc:** Madden, Joshua <madden.joshua@epa.gov>  
**Subject:** Re: Sterigenics Santa Teresa - questions

Cindy, I recommend that you work with both Roslyn and Mort to verify the data.

Sent from my iPhone

On Aug 13, 2018, at 8:26 AM, Parker, Cindy <parker.cindy@epa.gov> wrote:

Hi, Fran,

I had a voicemail from Madeleine concerning verifying 2014 emissions data on Sterigenics Santa Teresa, NM, facility.

Below emails detail where we left off with review. The only data we have is from TRI, as the state does not collect data from a non-Title 5 facility. Madeleine's voicemail indicates she wants the 2014 numbers verified.

Would you like me to:

1)ask the state (Roslyn) to contact the facility to verify 2014 data

Or

2)ask our R6 TRI folks to confirm 2014 emissions with the facility, since the only data we and the state have is reported through TRI?

Or

3)other ideas?

Josh – can you please dig out the numbers for Sterigenics? I think we used V1 to verify, didn't we? Their federal facility id is 7582111. Thank you.

Cindy

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**From:** Verhalen, Frances  
**Sent:** Friday, January 26, 2018 8:20 AM  
**To:** Smith, Darcie <Smith.Darcie@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>  
**Cc:** Parker, Cindy <parker.cindy@epa.gov>; Madden, Joshua <madden.joshua@epa.gov>  
**Subject:** FW: Sterigenics Santa Teresa - who did the review

NATA – I realize NATA is based on 2014 data. The NATA risk for this facility is modeled over 100-in-1M with 2014 data.

In 2015, Sterigenics Santa Teresa reduced their TRI by about 90%. Is there a way to qualify/asterisk/footnote the NATA assessment to show the facility has already taken action to reduce estimated EtO emissions?

Frances Verhalen, P.E., Chief  
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1445 Ross Avenue (MC 6MM-AM)  
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214-665-2172  
[verhalen.frances@epa.gov](mailto:verhalen.frances@epa.gov)

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**From:** Parker, Cindy  
**Sent:** Friday, January 26, 2018 7:56 AM  
**To:** Verhalen, Frances <[verhalen.frances@epa.gov](mailto:verhalen.frances@epa.gov)>; Larson, Darrin <[Larson.Darrin@epa.gov](mailto:Larson.Darrin@epa.gov)>  
**Cc:** Madden, Joshua <[madden.joshua@epa.gov](mailto:madden.joshua@epa.gov)>  
**Subject:** FW: Sterigenics Santa Teresa - who did the review

FYI –

Our Sterigenics facility reported their data through TRI. But, unfortunately, didn't get included in the list that the TRI effort (that's who Velu is) where HQ would call the facility to ask/verify data.

Fran, yesterday on the call, R5 mentioned a letter they had sent to their EtO facilities back in December, mentioning the cancer risk change and requesting a meeting. Their Sterigenics location declined their request for a meeting, but said they had figured a way to capture back vent and close out vent and it went to a wet scrubber (Darrin, add in here if I missed something), and that they had also done that with their New Mexico facility.

In the email below, Madeleine asks if we want to do anything. I don't know what our options would be, but I am happy to facilitate a conversation with Roslyn (my data contact at NM), or anyone else, if we want.

Darrin, I'm not sure I understood Margaret's explanation of Sterigenics' process, and was writing very fast, but she talked faster. Please add in, if I missed something.

Josh was also on the call. Chime in.

I talked with Madeleine after the call, hence the follow-up email below.

Cindy

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**From:** Strum, Madeleine  
**Sent:** Thursday, January 25, 2018 4:45 PM  
**To:** Parker, Cindy <[parker.cindy@epa.gov](mailto:parker.cindy@epa.gov)>  
**Cc:** Witt, Jon <[Witt.Jon@epa.gov](mailto:Witt.Jon@epa.gov)>; Smith, Darcie <[Smith.Darcie@epa.gov](mailto:Smith.Darcie@epa.gov)>; Palma, Ted <[Palma.Ted@epa.gov](mailto:Palma.Ted@epa.gov)>  
**Subject:** Sterigenics Santa Teresa - who did the review

Hi Cindy

I went to the Priority Facility List excel file which is at

[https://usepa.sharepoint.com/:x/r/sites/oar\\_Work/NATAREVIEW/2014%20NATA-%20Tract%20Risk%20Review/\\_layouts/15/WopiFrame.aspx?sourcedoc=%7BF75D0016-720B-45DE-AC34-508675F6F362%7D&file=Priority%20Facility%20List%20-based%20on%20tract%20risk.xlsx&action=default](https://usepa.sharepoint.com/:x/r/sites/oar_Work/NATAREVIEW/2014%20NATA-%20Tract%20Risk%20Review/_layouts/15/WopiFrame.aspx?sourcedoc=%7BF75D0016-720B-45DE-AC34-508675F6F362%7D&file=Priority%20Facility%20List%20-based%20on%20tract%20risk.xlsx&action=default) and it says that the state (Roslyn) reviewed the data

(not Velu). Hmm. I hope she didn't misunderstand the change sheet since she was new to inventories

when the review occurred I only asked Velu to help with TRI facilities that the State was unwilling to review. So he didn't call them.

Consistent with the information from Region V at today's call about Sterigenics implementing emission reduction strategies, TRI does show (their TRI id is 88008GRFFT2400A ) huge decreases in their emissions from 2014. Per the table below, ethylene oxide decreased from a total (stack plus fugitive) of 5761 lbs to 967 lbs in 2016 (83% reduction). I will add that to the updated-from-2014 list that I am keeping to track changes in emissions after 2014.

Not sure if you want to do anything here but I wanted to share with you this information.

<image001.jpg>

**Madeleine**

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711  
Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541  
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